

FILED
Clerk
District Court

JUL 10 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

KRISTIN D. ST. PETER T-00039
Assistant Attorney General
Commonwealth of the Northern Mariana Islands
Office of the Attorney General-Civil Division
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Caller Box 10007
Saipan, MP 96950

Attorney for: Defendants CNMI, Forelli, Bush, Cotton and Brown

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C. FORELLI,
WILLIAM C. BUSH, D. DOUGLAS COTTON,
L. DAVID SOSEBEE, ANDREW CLAYTON,
UNKNOWN AND UNNAMED PERSONS IN
THE CNMI OFFICE OF THE ATTORNEY
GENERAL, ALEXANDRO C. CASTRO, JOHN
A. MANGLONA, TIMOTHY H. BELLAS,
PAMELA BROWN, ROBERT BISOM, AND
JAY H. SORENSEN,

Defendants.

Case No. 05-0027

**DEFENDANTS' NOTICE OF MOTION
TO DISMISS SECOND AMENDED
COMPLAINT**

[Fed. R. Civ. P. 12 (b) (6)]

HEARING: AUG 10 2006
TIME: 9:00 a.m.

JUDGE: HON. ALEX R. MUNSON

NOTICE

PLEASE TAKE NOTICE THAT on AUG 10 2006, 2006, at 9:00 a.m./p.m., or

as soon thereafter as the matter may be heard, in the above-entitled Court, the Office of the Attorney

1 General of the Commonwealth of the Northern Mariana Islands, on behalf of Defendants
2 Commonwealth of the Northern Mariana Islands, Nicole Forelli, William Bush, D. Douglas Cotton,
3 and Pamela Brown, will and hereby do move this Court, pursuant to Rules 12(b)(6) of the Federal
4 Rules of Civil Procedure to dismiss this action for failure to state a claim upon which relief can be
5 granted.

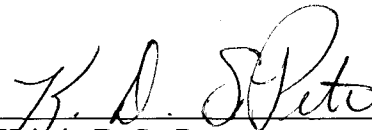
6 This Motion is based upon this Notice of Motion, Motion and incorporated Memorandum of
7 Points and Authorities, all pleadings and papers on file herein, all matters of which judicial notice may
8 be taken, and upon such further argument and evidence as may be considered by the Court at or before
9 the hearing on this matter.

10 Respectfully submitted,

11 OFFICE OF THE ATTORNEY GENERAL
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14 Dated: July 10, 2006.

By


Kristin D. St. Peter